

Approved:



DAVID R. FELTON
Assistant United States Attorney

Before: THE HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

20 MAG 3955

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of
18 U.S.C. §§ 1951 and 2

MAURICE WILLIAMS,

:

COUNTY OF OFFENSE:

Defendant.

: ORANGE

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SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL SISIA, being duly sworn, deposes and says that he is a Task Force Officer ("TFO") with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

1. On or about April 2, 2020, in the Southern District of New York and elsewhere, MAURICE WILLIAMS, the defendant, did knowingly commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS robbed a gas station store employee at knifepoint in Newburgh, New York.

(Title 18, United States Code, Sections 1951 and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a TFO with the FBI and a detective in the Town of Newburgh Police Department ("TNPD"), and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this

matter, my conversations with law enforcement agents, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part.

Overview

3. Based on my participation in this investigation with the TNPd and my review of TNPd reports, I know in substance and in part that, in the early morning hours of on or about April 2, 2020, a male later identified as MAURICE WILLIAMS, the defendant, entered a gas station store located on or around Route 9W in or around Newburgh, New York (the "Gas Station Store"), brandished a knife, threatened to stab an employee (the "Victim") manning the cash register, and robbed the Victim of approximately \$255 in cash from the till before fleeing the scene in an older-model, silver, four-door sedan missing the rear, driver-side hubcap (the "Car"). WILLIAMS was wearing, among other items, burgundy sweatpants, a black coat, and Jordan brand sneakers that were primarily black with red trim and a yellow Jordan logo.

Investigation

4. Based on my participation in this investigation with the TNPd and my review of TNPd reports, surveillance footage from the Gas Station Store, surveillance footage from City of Newburgh street cameras, and statements by the Victim,¹ I know the following information, in substance and in part:

- a. On or about April 2, 2020 at or around 3:32 a.m., the Car, coming from the south along Route 9W in or around Newburgh, New York and traveling north, entered the Gas Station Store parking lot and backed into a parking space.
- b. A male later identified as MAURICE WILLIAMS, the defendant, left the car from the front-passenger

¹On or about April 6, 2020, a TNPd detective ("Detective-1") showed the Victim a photo array of potential suspects that did not contain a photograph of MAURICE WILLIAMS, the defendant. The Victim mistakenly identified a male in the photo array who resembled WILLIAMS as the robber.

3

seat door and, at or around 3:34 a.m., entered the Gas Station Store.

- c. The driver of the Car remained in the Car the entire time and shut off the headlights.
- d. WILLIAMS was wearing, among other items, burgundy sweatpants, a black coat, a black hooded sweatshirt with the hood up, a black baseball cap, and Jordan brand sneakers that were primarily black with red trim and a yellow Jordan logo.
- e. WILLIAMS walked around the Gas Station Store and asked the Victim for Lysol spray and a pack of gum. WILLIAMS displayed approximately .75 cents to the Victim and asked what he could purchase for that sum of money.
- f. WILLIAMS attempted to purchase a banana-flavor pound cake and the Victim rung him up for approximately one dollar, the price of the pound cake.
- g. WILLIAMS displayed a small folding knife with a silver blade, which had been concealed in his coat sleeve.
- h. While displaying the knife, WILLIAMS threatened the Victim, in substance and in part, that if the Victim did not give WILLIAMS the money in the cash register, WILLIAMS would stab him, and the Victim should hurry up.
- i. The Victim opened the cash register and WILLIAMS leaned over the counter and grabbed and stole some of the money. The Victim also handed WILLIAMS some of the money because the Victim feared that WILLIAMS would stab him.
- j. WILLIAMS stole all of the cash from the Gas Station Store, estimated to be approximately \$255 in cash in a mixture of twenty-, ten-, five-, and one-dollar bills.
- k. At or around 3:39 a.m., WILLIAMS left the Gas Station Store by walking out at a fast pace and running to the Car.

4

- l. At or around 3:40 a.m., WILLIAMS entered the Car via the front, passenger-side door. The Car is an older-model, silver, four-door sedan missing the rear, driver-side hubcap.
- m. With no headlights turned on, the Car drove away south-bound along Route 9W in or around Newburgh, New York.
- n. Around the time of the knifepoint robbery - the wee hours of the morning in the midst of a pandemic - City of Newburgh street cameras reveal minimal additional vehicular traffic in the surrounding area.
- o. I have learned from an investigator at the Orange County Sheriff's Office working at the Hudson Valley Crime Analysis Center with access to City of Newburgh street cameras that, approximately seven minutes after the Car left the Gas Station Store parking lot, the Car was captured by City of Newburgh street cameras at or around the intersection of Liberty Street and Clinton Street in or around Newburgh, New York. This intersection is approximately 3 miles south of the Gas Station Store. At or around 4 a.m., City of Newburgh street cameras also captured the Car coming to a stop at or around the intersection of William Street and Benkard Avenue in or around Newburgh, New York. This intersection is approximately 4 miles south of the Gas Station Store. The Car then left the intersection.

5. Based on my participation in this investigation with the TNPd and my review of TNPd reports, surveillance footage from the Convenience Store, and surveillance footage from City of Newburgh street cameras, I know the following information, in substance and in part:

- a. Later that morning, between at or around 6:40 a.m. and 6:55 a.m., City of Newburgh street cameras again captured the Car at or around the intersection of William Street and Benkard Avenue in or around Newburgh, New York.
- b. At or around the same intersection of William Street and Benkard Avenue between at or around 6:40

5

a.m. and 6:55 a.m., a City of Newburgh street camera captured a male entering a convenience store on or around William Street (the "Convenience Store").

- c. The male, later identified as MAURICE WILLIAMS, the defendant, matched the description of the Gas Station Store robber, and was wearing what appeared to be the same burgundy sweatpants, black coat, and black hooded sweatshirt.
- d. Surveillance footage from inside the Convenience Store at or around 6:47 a.m. (the "Convenience Store Footage") shows WILLIAMS, wearing burgundy sweatpants, a black coat, and a black hooded sweatshirt, with a wad of cash paying for lottery tickets.

6. Based on my participation in this investigation with the TNPd and my review of TNPd reports, I know the following information, in substance and in part:

- a. Three law enforcement officers familiar with MAURICE WILLIAMS, the defendant, from prior, in-person encounters with WILLIAMS were shown the Convenience Store Footage. Two of these officers are detectives (one of whom also is an FBI TFO) in the City of Newburgh Police Department (the "CNPd") ("Detective-2/TFO-1" and "Detective-3") and the third officer is a detective in the New Windsor Police Department and also an FBI TFO ("Detective-4/TFO-2"). All three officers concluded that WILLIAMS and the male in the Convenience Store Footage wearing burgundy sweatpants, a black coat, and a black hooded sweatshirt, are one and the same individual.
- b. I have reviewed the Convenience Store Footage, the Gas Station Store footage, and photographs of WILLIAMS from law enforcement databases. I believe that the male in the Convenience Store Footage wearing burgundy sweatpants, a black coat, and a black hooded sweatshirt, the male in the Gas Station Store footage wearing burgundy sweatpants, a black coat, and a black hooded sweatshirt, and WILLIAMS, are one and the same individual.

6

7. Based on my participation in this investigation with the TNPd and my review of TNPd reports, I know the following information, in substance and in part:


- a. On or about April 14, 2020, in an unrelated matter, MAURICE WILLIAMS, the defendant, was in TNPd custody at TNPd headquarters in or around Newburgh, New York.
- b. WILLIAMS initially provided a false name "Lamont Staples" to the TNPd officers but, after a fingerprint analysis confirmed that his true identity was WILLIAMS, WILLIAMS positively identified himself as WILLIAMS.
- c. WILLIAMS was wearing, among other items, a black coat and Jordan brand sneakers that were primarily black with red trim and a yellow Jordan logo.
- d. I have reviewed photographs of the Jordan brand sneakers worn by WILLIAMS at TNPd headquarters on or about April 14, 2020. I believe that the sneakers are the same sneakers worn by WILLIAMS during the April 2, 2020 Gas Station Store robbery.
- e. I have reviewed WILLIAMS's Facebook page, which identifies the profile holder's name as "Maurice Williams." In a photograph from on or about December 12, 2019 on WILLIAMS's Facebook page, WILLIAMS appears to be wearing the same Jordan brand sneakers that he wore at TNPd headquarters on or about April 14, 2020 and during the April 2, 2020 Gas Station Store robbery.

7

WHEREFORE, deponent respectfully requests that MAURICE WILLIAMS, the defendant, be arrested, and that he be imprisoned or bailed, as the case may be.

/s/ Michael Sisia
MICHAEL SISIA
Task Force Officer
Federal Bureau of Investigation

Sworn to before me this 16th day of April, 2020 by reliable electronic means (FaceTime, credentials observed)



THE HONORABLE PAUL E. DAVISON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK